

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Bankr. No. 22-22571 CMB
JERMAINE T. REDMAN,)	
)	Chapter 13
)	
Debtor.)	
)	
VILLAGE CAPITAL &)	Docket No. 47
INVESTMENTS,)	Related to Docket 42, 46
)	
Movant.)	
)	Hearing Date & Time: 9/14/2023 at 1:30 p.m.
vs.)	
)	
JERMAINE T. REDMAN AND)	
RONDA J. WINNECOUR,)	
CHAPTER 13 TRUSTEE, W.D.)	
PA.)	
Respondents.)	

DEBTOR'S RESPONSE TO MOVANT'S MOTION FOR RELIEF FROM STAY

AND NOW COMES, Jermaine T. Redman, by and through his attorney Rodney D. Shepherd, who respectfully represents the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Debtor is without sufficiency knowledge to know the accuracy of this statement.
8. Admitted.
9. Admitted. Debtor wishes to do a loan modification in order to make the monthly

Chapter 13 payment more feasible.

10. Admitted.

11. Admitted.

12. Admitted.

13. Admitted.

14. Denied.

15. Denied. It is true that there is no equity in the property at this time. However, the Debtor wishes to do a loan modification which both parties will benefit from. This should make the amount of the debt and the value of the property about the same, if not even a little equity.

16. Admitted.

WHEREFORE, Debtor, Jermaine T. Redman prays that this Honorable Court deny the Movant's Motion For Relief From Stay.

Date: 8/30/2023

By: /s/ Rodney D. Shepherd
Rodney D. Shepherd, Esquire
Attorney for the Debtor
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CERTIFICATE OF SERVICE

I, Rodney D. Shepherd, attorney for the Debtor hereby certifies that a true and correct copy of the Debtor's Response to the Movant's Motion For Relief Frm Stay was served on the 30th day of August 2023, by electronic filing, upon the following:

Ronda Winnecour, Esquire
Chapter 13 Trustee
cmecf@chapter13trusteewdpa.com

KML Law Group
c/o Brian Nicholas, Esquire
bnicholas@kmlawgroup.com

By: /s/ Rodney D. Shepherd
Attorney for the Debtor